

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

EDWARD BRONSON and  
E-LIONHEART ASSOCIATES, LLC,  
d/b/a FAIRHILLS CAPITAL,

Defendants ,

and

FAIRHILLS CAPITAL, INC.,

Relief Defendant.  
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No. 12 Civ. 6421 (KMK)(JCM)

**NOTICE OF MOTION OF PLAINTIFF SECURITIES AND EXCHANGE  
COMMISSION’S MOTION FOR SUMMARY JUDGMENT  
AGAINST DEFENDANTS AND RELIEF DEFENDANT**

PLEASE TAKE NOTICE, pursuant to the Court’s Order of April 13, 2016 (Docket No. 143), that upon the basis of the accompanying Memorandum in Law in Support of Plaintiff Securities and Exchange Commission’s (“SEC”) Motion for Summary Judgment Against Defendants and Relief Defendant, Plaintiff SEC’s Local Rule 56.1 Statement of Undisputed Material Facts, the Declaration of Doreen M. Rodriguez executed June 9, 2016, the Declaration of Gregorie Sylvester executed June 10, 2016, the Declaration of Kevin McGrath executed June 10, 2016, and all the accompanying exhibits thereto, Plaintiff will move this Court before the Honorable Kenneth M. Karas, at the United States District Court for the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601, at a time and date to be set by the Court, for an Order, pursuant to Federal Rule of Civil Procedure 56, granting summary

judgment to Plaintiff on all claims against Defendants and Relief Defendant and granting the requested relief.

Dated: New York, NY  
June 10, 2016

Respectfully submitted,

/s/ Kevin P. McGrath\_\_\_\_\_

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Haimavathi V. Marlier  
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